

## **EXHIBIT B**

	)	
<b>ANNE SMITHERS, et al,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	<b>Civ. Action No. 1:18cv676 (TSE/IDD)</b>
<b>vs.</b>	)	
	)	
<b>FRONTIER AIRLINES INC.,</b>	)	
	)	
<b>Defendant.</b>	)	
	)	

To: Frontier Airlines Inc. (“Frontier”)

Pursuant to relevant law, Frontier has a duty promptly (A) to designate to Plaintiff's counsel one or more representatives to address one, some or all of the following areas of inquiry as a witness, by inquiry number, (B) to prepare the witness in advance of the deposition to make admissions on behalf of the Defendant pursuant to FRCP 30(b)(6), and (C) to identify them by name in writing and numerical area of response to Plaintiffs' counsel one week in advance of the deposition. If Frontier fails to produce a representative responsive to an area of inquiry, it must designate another. See, *Alexander v. FBI*, 186 F.R.D. 148 (1999).

Plaintiff will seek testimony in the following areas of inquiry:

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person involved in the administration, collection of data related to, and reporting or recording of any such test. The Pilot's activities 24 hours prior to scheduled departure

3. Frontier's pilot rules for rest, alcohol consumption and delay of scheduled departure.
4. Details why the co-pilot of the Aircraft slept on the floor and wore sunglasses at night before daybreak prior to the delayed departure of the Aircraft.
5. The contractual or other, if any, relationship between Frontier and any other person, firm or entity ( a "person") that provides for staffing by such other person at the Frontier gates and on the Aircraft, including specifically on the Aircraft at Denver Int'l Airport on 12-25-17 and/or the gate (the "Cabin Staff").
6. The circumstances relating to why the Cabin Staff boarded the Aircraft and removed Plaintiff Smithers, including decision making, the chain of command, operating procedures and guidelines.
7. The names and circumstances of the individuals who for any reason after boarding did not remain aboard the aircraft from Denver to Washington on 12-25-17.
8. The names, work history and disciplinary history of the individuals from Frontier or Cabin Staff who removed Mrs. Smithers or were present aboard the Aircraft between 7:00 AM on 12/25/2017 until the Aircraft was in flight and en route to Washington (including cabin crew who work for Frontier).
9. The name, work history and disciplinary history of the individual who decided Mrs. Smithers must be removed from the Aircraft and the related circumstances.
10. The name, work history and disciplinary history of the individual who allegedly defamed Mrs. Smithers as described in the Complaint, and the basis therefor.
11. The name, work history and disciplinary history of the individual who allegedly prevented Mrs. Smithers from returning to her son his nebulizer, and the basis therefor.
12. The name, work history and disciplinary history of the individuals from Frontier or Cabin Staff who requested police assistance at the gate once Mrs. Smithers was outside the Aircraft having previously boarded.
13. The name, work history and disciplinary history of the individuals from Frontier acting as Flight Attendants on the Aircraft for the flight on 12-25-17 from Denver to Washington.
14. Any forms, reports, messages or other communications received by or transmitted by any member of the Cabin Staff or any employee or officer of Frontier related to the removal of Mrs. Smithers from the Aircraft or the denial of her transferring to her son his nebulizer.
15. The records related to the missed approach of the Aircraft at destination identifying the pilot in command and the reason for the missed approach.
16. The name and address of every individual who was consulted by the deponent to receive information in order to prepare for their deposition under this notice (and this applies to each deponent).
17. The documents consulted by the deponent in order to prepare for their deposition under this notice and the location of such documents (and this applies to each deponent).

18. The insurance Frontier or the Cabin Staff may have to address and respond to the claims of the Plaintiffs against Frontier, including the name of the insurer, the security if any for such insurances and all material terms, amount, limitations and exclusions.

Date & time: Monday, April 1, 2019, beginning at 10:00 A.M.  
Place: Law Offices of Elaine Bredehoft  
And at Plaintiffs' option by video connection to  
Charlottesville, VA  
The Witness and Court Reporter will be in Fairfax, VA  
Court Reporter: TBD

Dated: February 15, 2019  
Charlottesville, VA 22902

Signed:       /s/ William T. Woodrow, III, Esq.         
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 15<sup>th</sup> day of February 2019, I sent by e mail and US Mail the preceding Deposition Notice under FRCvP 30(b)(6) to the following individual:

*ELAINE CHARLSON BREDEHOFT*

Elaine Charlson Bredehoft, VSB No. 23766

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*Frontier Airlines, Inc*

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